

Storm, Christopher

From: Jeffrey Adams <Jeffrey.Adams@piblaw.com>
Sent: Tuesday, November 14, 2017 5:01 PM
To: Landers, Edwin
Cc: Juan Lopez; Storm, Christopher
Subject: RE: Christ v. Santander- Joint scheduling statement

Ed,

With all due respect, our MTD is not as you are claiming. Rather, as the MTD argues, it seeks to reduce your clients' claimed damages but for \$140,000.00. I recommend reviewing it again. I am happy to have a call to discuss the MTD tomorrow if you would like.

Regards,
Jeff

Sent with BlackBerry Work
(www.blackberry.com)

From: Landers, Edwin <ELanders@morrisonmahoney.com>
Date: Tuesday, Nov 14, 2017, 4:53 PM
To: Jeffrey Adams <Jeffrey.Adams@piblaw.com>
Cc: Juan Lopez <Juan.Lopez@piblaw.com>, Storm, Christopher <CStorm@morrisonmahoney.com>
Subject: RE: Christ v. Santander- Joint scheduling statement

Jeff,

In extending the below courtesy to you, I certainly was not anticipating your clients' filing another motion to dismiss where your clients' prior motion to dismiss already had been denied by the court. Your moving to dismiss again is nothing more than an abusive tactic to try to run up the fees and costs of litigation for our clients who are customers. Kindly advise if you will withdraw your clients' motion. If not, we will respond appropriately.

Regards,
Ed

Edwin F. Landers, Jr.

Partner

MORRISON MAHONEY LLP

250 Summer Street, Boston, MA 02210

T 617.439.7583 | F 617.342.4967

elanders@morrisonmahoney.com | www.morrisonmahoney.com

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From: Jeffrey Adams [mailto:Jeffrey.Adams@piblaw.com]
Sent: Monday, November 06, 2017 2:46 PM
To: Landers, Edwin <ELanders@morrisonmahoney.com>; Storm, Christopher <CStorm@morrisonmahoney.com>
Cc: Juan Lopez <Juan.Lopez@piblaw.com>
Subject: RE: Christ v. Santander- Joint scheduling statement

Great. Thank you for the courtesy.

Regards,
Jeff

Jeffrey D. Adams
PIB Law | 617.918.7611

From: Landers, Edwin [mailto:ELanders@morrisonmahoney.com]
Sent: Monday, November 06, 2017 1:43 PM
To: Jeffrey Adams; Storm, Christopher
Cc: Juan Lopez
Subject: RE: Christ v. Santander- Joint scheduling statement

That's fine, Jeff.
Ed

Edwin F. Landers, Jr.

Partner

MORRISON MAHONEY LLP

250 Summer Street, Boston, MA 02210

T 617.439.7583 | F 617.342.4967

elanders@morrisonmahoney.com | www.morrisonmahoney.com

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From: Jeffrey Adams [mailto:Jeffrey.Adams@piblaw.com]
Sent: Monday, November 06, 2017 1:33 PM
To: Storm, Christopher <CStorm@morrisonmahoney.com>
Cc: Landers, Edwin <ELanders@morrisonmahoney.com>; Juan Lopez <Juan.Lopez@piblaw.com>
Subject: RE: Christ v. Santander- Joint scheduling statement

Ed – It's my understanding that Chris is out today and tomorrow. Will you assent to our request below?

Regards,
Jeff

Jeffrey D. Adams
PIB Law | 617.918.7611

From: Jeffrey Adams
Sent: Monday, November 06, 2017 1:28 PM
To: 'Storm, Christopher'
Cc: Landers, Edwin; Juan Lopez
Subject: RE: Christ v. Santander- Joint scheduling statement

Chris – By our calculation, Santander's response to Plaintiffs' Amended Complaint is due this Wednesday, 11/8. Would your clients assent to a one week extension – or until 11/15/2017 – for Santander to file its response?

Regards,
Jeff

Jeffrey D. Adams
PIB Law | 617.918.7611

From: Storm, Christopher [<mailto:CStorm@morrisonmahoney.com>]
Sent: Thursday, October 19, 2017 3:16 PM
To: Jeffrey Adams
Cc: Landers, Edwin; Juan Lopez
Subject: RE: Christ v. Santander- Joint scheduling statement

Thanks, Jeff.

Chris

From: Jeffrey Adams [<mailto:Jeffrey.Adams@piblaw.com>]
Sent: Thursday, October 19, 2017 3:15 PM
To: Storm, Christopher <CStorm@morrisonmahoney.com>
Cc: Landers, Edwin <ELanders@morrisonmahoney.com>; Juan Lopez <Juan.Lopez@piblaw.com>
Subject: RE: Christ v. Santander- Joint scheduling statement

Chris – I received your voicemail. I will forward revisions to your proposed Joint Schedule tomorrow. Thanks, Jeff

Jeffrey D. Adams
PIB Law | 617.918.7611

From: Storm, Christopher [<mailto:CStorm@morrisonmahoney.com>]
Sent: Tuesday, October 17, 2017 8:37 PM
To: Jeffrey Adams
Cc: Landers, Edwin
Subject: Christ v. Santander- Joint scheduling statement

Dear Jeffrey-

We have drafted the attached joint scheduling statement for your review and filing in advance of the upcoming scheduling conference. Please share any thoughts you might have with us. Thanks.

-Chris

Christopher C. Storm
Associate
MORRISON MAHONEY LLP

250 Summer Street, Boston, MA 02210
T 617.439.7536 | F 617.342.4816
cstorm@morrisonmahoney.com | www.morrisonmahoney.com

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